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July 7, 2021

Honorable Judge Allyne R. Ross  
225 Cadman Plaza East  
Brooklyn, NY 11201

***Re: Express Freight Systems, Inc. v. YMB., Case No. 20-cv-00186 (ARR)(LB)***

Honorable Judge Ross:

This firm represents Defendant, YMB Enterprise Inc. On June 30, 2021, in response to Defendant's request to file a cross-motion [ECF 76], by electronic Order, Your Honor directed that Plaintiff's motions for sanctions and summary judgment shall be briefed "according to the same schedule . . . opposition papers shall be served no later than July 9<sup>th</sup>, 2021 and plaintiff's reply papers, shall be served no later than July 16<sup>th</sup>, 2021."

Unfortunately, since the beginning of this month, I have been out of pocket because of medical issues and doctors visits. Moreover, my firm has been set back due to the loss of an associate and a paralegal who are having their own respective difficulties.

Due to the foregoing, I have been unable to complete the opposition to Plaintiff's respective motions.

As such, Defendant respectfully requests that the time to serve opposition to Plaintiff's respective motions be extended two-weeks from July 9, 2021 to July 23, 2021, and likewise, that Plaintiff's time to serve its reply papers, be extended from July 16, 2021 to July 30, 2021.

Defendant will be severely prejudiced if it is not granted an extension, while, Plaintiff will suffer no prejudice by a two-week extension, particularly since Plaintiff is only requesting partial summary judgment and expects to conduct post motion proceedings.

This day, requesting a two-week extension, I contacted counsel for Plaintiff, who did not consent, only stating "my client will not authorize me to delay this matter any further."

Respectfully submitted,

/ s / Levi Huebner

*Attorneys for YMB Enterprise Inc.*